



**GOLOMB & HONIK**  
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July 1, 2019

**VIA FACSIMILE (856-757-5355)**

Hon. Robert B. Kugler  
United States District Court  
for the District of New Jersey  
U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Hon. Joel Schneider  
United States District Court  
for the District of New Jersey  
U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: *In re Valsartan Products Liability Litigation*, No. 1:19-md-02875-RBK-JS (D.N.J.)

Dear Judge Kugler and Magistrate Judge Schneider:

Plaintiffs submit this letter in support of their request to modify dates in CMO #4, and to provide further information regarding the PSC's time and expense reporting process.

Plaintiffs request that Paragraphs 4.6(3) and 4.6(4) of CMO #4 be modified to extend the dates of certain deadlines and reporting periods. These modifications are necessary to allow adequate time for the Time and Expense Committee to set up the cloud-based time and expense reporting program; train counsel in using the program; allow adequate time for firms to get their initial data uploaded and to address any issues encountered in that process; allow adequate time for the Time and Expense Committee to conduct its review function; and, allow adequate time for time and expense reports to be compiled for the Court's quarterly review. The specific changes are outlined below, with the new requested dates highlighted in bold.

CMO #4, Paragraph 4.6(3), is requested to be modified to read as follows:

All time and expenses shall be submitted on a monthly basis and will be due on the 15<sup>th</sup> day of the following month. The first time and expense report, due **August 15, 2019**, will be cumulative for the hours expended and expenses incurred during this MDL litigation up to and including **July 31, 2019**. The second submission will be due **September 15, 2019**, for the time and expenses incurred during **August, 2019**, and so forth. These deadlines may be amended from time to time in the discretion of Co-Lead Counsel.

CMO #4, Paragraph 4.6(4), is requested to be modified to read as follows:

The Plaintiffs' Executive Committee shall promptly retain a CPA. The CPA will assist in compiling submissions and will provide reports to Co-Lead Counsel who



Hon. Robert B. Kugler  
Hon. Joel Schneider  
July 1, 2019  
Page 2

[ shall submit them to the Court on a quarterly basis. The first time and expense report submitted to the Court, due September 15, 2019, will be cumulative for the hours expended and expenses incurred during this MDL litigation up to and including July 31, 2019. The second submission will be due December 15, 2019, and so forth.]

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Thank you for your courtesies and consideration.

Respectfully,

Ruben Honik  
**GOLOMB & HONIK**

cc: Adam M. Slater (via email)  
Daniel A. Nigh (via email)  
Conlee S. Whiteley (via email)  
Seth A. Goldberg (via email)  
Lori G. Cohen, Esq. (via email)  
Clem C. Trischler (via email)  
Richard W. Smith (via email)  
Jessica Priselac (via email)

→ FOR good CAUSE  
Shown,

So Ordered this 17<sup>th</sup> day  
of July, 2019  
Joel Schneider  
**JOEL SCHNEIDER, USM**